

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re)	Chapter 15
Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., ¹)	Case No. 22-10630 (JTD)
Debtor in a Foreign Proceeding.)	Hearing Date: TBD
)	Obj. Deadline: Dec. 6, 2022 at 4:00 p.m. (ET)
)	Re: Docket No. 95
)	

**NOTICE OF FILING OF AMENDED BIDDING
PROCEDURES MOTION AND BLACKLINE**

PLEASE TAKE NOTICE that, on October 26, 2022, Robert Wagstaff (the “**Foreign Representative**”), in his capacity as duly appointed foreign representative by Mr. Fernando Alonso-de-Florida Rivero, the court-appointed liquidator (*Liquidador Judicial*) of the Special Expedited Commercial proceeding (*Via Sumaria Especial Mercantil*) for the dissolution and liquidation of Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., pending in the 52nd Civil State Court of Mexico City pursuant to, among others, Articles 229, 232, 233, and 236 of the *Ley General de Sociedades Mercantiles*, filed a motion seeking entry of an order (the “**Bidding Procedures Order**”):² (i) authorizing and approving the bidding procedures, substantially in the form attached thereto as Schedule I (the “**Bidding Procedures**”) for the proposed sale (the “**Sale**”) of substantially all of the above-captioned chapter 15 debtor’s direct and/or indirect equity interests (the “**CRUSAFin Interests**”) in a majority-owned, U.S. subsidiary, Crédito Real USA Finance,

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

² Capitalized terms used but not defined herein shall have the respective meanings ascribed to such terms in the Motion (as defined below) or Bidding Procedures Order, as applicable.

LLC (“**CRUSAFin**”), (ii) scheduling an auction of the CRUSAFin Interests (the “**Auction**”) and a final hearing to consider a sale of the CRUSAFin Interests to a Successful Bidder (the “**Sale Hearing**”), (iii) approving the form and manner of notice of the Bidding Procedures, the Auction, and the Sale Hearing, including the form of notice of the proposed Sale substantially in the form attached thereto as Schedule II and notice of, among other things, the Foreign Representative’s selection of a Successful Bidder substantially in the form attached thereto as Schedule III (Schedule II and Schedule III together, the “**Notices**”), and (iv) granting related relief (the “**Motion**”). **You were previously served with a copy of the Motion.**

PLEASE TAKE FURTHER NOTICE that, contemporaneously herewith, the Foreign Representative filed an amended version of the Motion (the “**Amended Motion**”), which includes revised versions of the Bidding Procedures Order, the Bidding Procedures, and the Notices. A copy of the Amended Motion is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that, for the convenience of the Court and all parties in interest, a blackline comparison of the Motion marked against the Amended Motion (including the Bidding Procedures Order, the Bidding Procedures, and the Notices), is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that, any responses or objections solely with respect to any amendments as set forth in the Amended Motion must be filed in writing with the Court, 824 Market Street, 5th Floor, Wilmington, Delaware 19801 by **December 6, 2022 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the Amended Motion will be held before The Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware

19801, on **a date and time TO BE DETERMINED**. Once a hearing with respect to the Amended Motion is scheduled, a separate notice with such hearing information will be filed with the Court and served.

Dated: November 29, 2022

Respectfully submitted,

/s/ Amanda R. Steele

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